

**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
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January 2, 2020

**By Electronic Mail and First Class Mail**

Ms. Sheri L. Bianchin  
Remedial Project Manager  
Institutional Controls Coordinator  
U.S. Environmental Protection Agency Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree – Quarterly Progress Report 56 (October-December 2019)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for activities performed during the period from October-December 2019.

**1. Actions Taken During Previous Quarter to Comply with the Consent Decree:**

- **Institutional Controls:** During the October-December 2019 period, the Group discussed institutional controls for the remote fill properties with EPA and participated in EPA's annual site visit. Also, the Group's project coordinator met on November 12, 2019 with the Venice attorney's assistant as part of efforts to resume discussions about the Venice roadways ordinance.
- **Groundwater Monitoring:** On October 7, 2019, the Group's project coordinator sent an email to EPA to provide a report prepared by the Group's consultant, Environmental Works, Inc. (“EWI”), documenting the work performed to abandon damaged monitoring well MW-105S at the main industrial site and to construct concrete bollards around monitoring well MW-105D to protect the well from vehicle traffic.
- **Clarios' Notification to EPA:** On November 5, 2019, Clarios' representative forwarded an email to EPA's project manager regarding EPA regional counsel's acknowledgement of the change in corporate responsibility (and communication) from Johnson Controls Inc. to JCBGLLC (n.k.a. Clarios).
- **Operation and Maintenance:** During the October-December 2019 period, the following operation and maintenance activities were performed at the site:

October 24	The Group's contractor, Munie Greencare Professionals ("Munie"), reseeded the strip of soil between the sidewalk and State Street along the 1555 State Street property in Granite City.
Week of November 4	Munie cut the vegetation on the 1555 State Street and Taracorp pile properties in Granite City.
November 12	The Group's project coordinator performed a semi-annual operation and maintenance inspection at the site.
November 18	Based upon the results of the operation and maintenance inspection, the Group's project coordinator sent an email to Munie to request that Munie cut/remove several small bushes/shrubs along the State Street sidewalk and remove vegetation from a short section of fence along State Street.
November 18	Based upon the results of the operation and maintenance inspection, the Group's project coordinator sent an email to the owner/operator of All Pallet Service to request that All Pallet Service repair a short section of fence along the southern end of the Taracorp pile that had separated from the fence post and repair a bent section of fence from a pile of wood that slid into the fence.
November 19	The Group's project coordinator sent a letter, log sheets, and photographs to EPA to document the results of the November 12, 2019 operation and maintenance inspection at the site.
November 27	Munie cut/removed several small bushes/shrubs along the State Street sidewalk and removed vegetation from a short section of fence along State Street.

- **Project Coordination:** During the October-December 2019 period and in addition to items previously noted, the Group's project coordinator communicated with the following parties regarding work at the site:

October 3	Submitted Quarterly Progress Report 55 to EPA.
October 7	Sent an email to EPA's project manager to provide EWI's report documenting the work performed at the site to abandon monitoring well MW-105S and to install bollards around monitoring well MW-105D.
October 11	Participated on a conference call with representatives of EPA, Illinois EPA, and the Group and discussed institutional controls activities.
October 24	Sent an email to EPA in regard to EPA's bill for response costs.
October 28	The Group's project coordinator sent an email to Beelman River Terminals' representative regarding the schedule for the November 2019 annual site visit with EPA, Illinois EPA, and the Group.
November 6	Participated on a conference call with representatives of EPA, Illinois EPA, and the Group and discussed institutional controls activities.
November 6	Communicated with EPA's project manager regarding the ordinance for the Venice roadways.
November 12	Performed a semi-annual operation and maintenance inspection at the site.

November 12	Met with the Venice attorney's assistant as part of efforts related to the Venice roadways ordinance.
November 13	Participated in EPA's annual site visit and meeting with representatives of EPA, Illinois EPA, and the Group.
November 18	Sent a follow-up inquiry to EPA regarding the status of EPA's responses to the Group's questions about EPA's bill.
November 18	Based upon the results of the operation and maintenance inspection, sent an email to Munie to request that Munie cut/remove several small bushes/shrubs along the State Street sidewalk and remove vegetation from a short section of fence along State Street.
November 18	Based on the results of the operation and maintenance inspection, sent an email to the owner/operator of All Pallet Service to request that All Pallet Service repair a short section of fence along the southern end of the Taracorp pile that had separated from the fence post and repair a bent section of fence from a pile of wood that slid into the fence.
November 19	Sent a letter, log sheets, and photographs to EPA to document the results of the November 12, 2019 operation and maintenance inspection at the site.
November 19	Sent an email to Beelman Trucking's representatives to request updates regarding the Brenda Irvin property at Slough Road.
November 21	Received a response from EPA's project manager in regard to EPA's plans to issue a revised bill.
December 5	Received EPA's revised bill and issued it to the Group for review.

**2. Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

**3. Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- Not applicable during this reporting period.

**4. Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- The Group's representatives will continue to perform operation and maintenance activities at the site, as required. As part of the Group's operation and maintenance activities, the Group anticipates that additional discussions will occur with EPA related to operation and maintenance activities for several remote fill properties.
- The Group anticipates that additional discussions will occur with the Venice attorney in regard to the Venice roadways ordinance.
- The Group will continue to monitor All Pallet Services' efforts to repair the fence along the south side of the Taracorp pile.

- The Group will address comments, if any are received, on the draft notices of soil contamination and draft notices of potential soil contamination for 15 denied access residential properties that were submitted to EPA and Illinois EPA in September 2019.
- The Group will address EPA's comments, if any are received, on the revised draft environmental covenants submitted to EPA and Illinois EPA in May 2019.
- The Group will address EPA's comments, if any are received, on the draft administrative records and supporting documents for the 15 denied access residential properties, which were submitted to EPA in March 2019.
- The Group's project coordinator will continue to update the Operation and Maintenance Plan as institutional controls activities are finalized.
- The Group will continue to address EPA's comments, update the Institutional Controls Work Plan, and implement institutional controls as the scope of institutional controls activities are finalized.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA in February 2019 to document the results of the November 2018 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to: (1) the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April-May 2011, September 2012, June 2013, and October 2013; (2) the Soil Sampling and Analysis Report Addendum, which was submitted to EPA in December 2015 to document the results of soil sampling performed on three residential properties (Non-Responsive, Non-Responsive, and Non-Responsive) in June 2015 and one residential property (Non-Responsive) in November 2015; and (3) the Soil Sampling and Analysis Report Addendum No. 2, which was submitted to EPA in September 2016 to document the results of soil sampling activities performed on three residential properties (Non-Responsive) in August 2016.

**5. Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- During the May 2019 operation and maintenance inspection, the Group's project coordinator observed scattered hard rubber battery case chips in the surface soil in several areas on a vacant lot on Harrison Street in Eagle Park Acres where vegetation appeared to have been recently cleared. The Group's project coordinator notified EPA about this matter on May 24, 2019 and examined the property with EPA and Illinois EPA during the November 2019 site visit. The Group anticipates that additional discussions will occur with EPA about this matter.

**6. Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

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**7. Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

**LEED ENVIRONMENTAL, INC.**



Jeffrey A. Leed  
Project Coordinator

cc: Nicole Wood-Chi, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)  
Mr. Brian Conrath - Illinois EPA (by electronic mail and first class mail)  
Mr. Tom Miller – Illinois EPA (by electronic mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)